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Customer Proprietary Network Information: Training for Open Range

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What is Customer Proprietary Network Information (CPNI)?

- CPNI, or Customer Proprietary Network Information, is personal customer account information that telephone companies acquire when they provision and provide service.
- All information about your customer's account is considered to be CPNI. This includes calling plans, number of lines, features, billing information and all aspects of call detail records. Common components of call detail records include where a customer is calling, how often they call, how long the calls last, and the time the call is placed.
- Public information, including customer name, address and phone number is not considered to be CPNI data.

Why is CPNI Important?

- As part of the Telecommunications Act, the FCC has mandated that Telecom carriers take steps to protect customer CPNI.
- A recent update to the ruling (Dec 2008) requires that service providers only disclose call detail information over the phone when a customer provides a password. The customer password must be unique to the customer and not based on any biographical or account information.

Why did the FCC Adopt new Rules?

- The FCC learned of numerous cases in which “pretexters” were able to trick telephone company CSRs into revealing call records.
- “Pretexters” are those individuals that pretend to be the customer of record. Pretexters may be ex-spouses or professional investigators who might have a lot of data about a customer....such as SSN, Account Number, Mother’s maiden name, etc. They will often use many tactics to try and convince the CSR that they are a real customer.

Compliance is Important

- Telecommunication providers are held to strict standards in protecting CPNI.
- The FCC will impose very large fines for a violation (ie. \$100,000 per occurrence).
- The FCC may investigate Open Range policy and test our compliance at any time.
- All personnel with access to customer proprietary data must attend annual CPNI training and be vigilant when following account authentication processes.

Reporting a CPNI Breach

- In the event of an unintentional disclosure, all personnel are expected to self-report violations.
- If you become aware of a possible instance in which a customer's CPNI has been or may have been revealed to an unauthorized person, please contact your supervisor immediately.
- Willful disclosure of CPNI to an unauthorized person will result in strict disciplinary actions, up to and including termination. A new federal law imposes serious criminal penalties for selling or improperly transferring confidential phone records.

Inbound Customer Service Calls

- CSR's should authenticate each caller by confirming the service address and the last 4 digits of the customers credit card that is used to pay the bill
- When the last 4 digits of the credit card is collected, the CSR can disclose any information related to the customers account . The CSR can also make any changes to the account the caller requests.
- If the caller can not authenticate by providing the last four digits, the CSR can not reveal CPNI data, however, the CSR can still help the customer in any area that does not require disclosing CPNI information or changing the account information.

Examples of Customer Requests

4 Digit Password Required CPNI Requested

- Can you tell me what calls were made on 8/16?
- Were there calls made to 303-670-0747 on 7/4?
- How many calls were made last month?
- What numbers were dialed last week?
- What features are being used on this account?
- I want to make a change on this account.
- What is the credit card number associated with this account?

No Password Required No Impact to CPNI

- I was reviewing my account online and I did not call 303-670-0747. Can you please give me a credit.
- I was reviewing my online call detail and I noticed a call for 1200 minutes to 815-555-5555. How can I find out who this number belongs to?
- My Service is not working, can you help me.
- What features are available with Open Range telephone service?
- What is the price of the Perfect Package?

Other protected methods to share CPNI data.

- In the event that a customer can not remember their password and needs to discuss CPNI information (or make changes to their account), an outbound call can be made to the phone number of record to authenticate the customer.
 - The phone number of record is defined as the phone number on which Open Range provides service that is associated with the customer account.
- Customers can access confidential account information and call history online through a secure log in at www.openrange.net
- Confidential CPNI data may also be mailed to the email address of record or the postal address if necessary.

Use of CPNI for marketing purposes

- FCC rules regulate the use of CPNI data for marketing purposes.
- Personnel are not allowed to view individual account data in order to upsell or offer additional services unless they have been granted permission by the customer.
- Aggregated data that does not reveal individual customer records is allowed in the development of marketing campaigns.

Summary

- Open Range has a responsibility to protect CPNI
- Open Range will use passwords to authenticate customers and protect against pretexters.
- Other methods of authentication are available if a customer forgets the password.
- Open Range must keep record when a breach in CPNI has occurred.
- Open Range can not use individual customer data to market additional services to customer unless they have permission from the customer to do so.